

DEC - 9 1993

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of: )  
Policies and Rules Implementing ) CC Docket No. 93-22  
the Telephone Disclosure and ) RM-7990  
Dispute Resolution Act )

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**REPLY OF THE  
UNITED STATES TELEPHONE ASSOCIATION**

The United States Telephone Association (USTA) respectfully submits this Reply to the Comments of Sprint Communications Company, L.P., on the petitions for reconsideration that have been filed with the Commission for relief from the Commission's recently adopted rules addressing 900 pay-per-call services. The rules sought to implement the Telephone Disclosure and Dispute Resolution Act of 1992 (TDDRA).

Sprint's Comments contain one significant error - actually what appears to be a fundamentally erroneous assumption - that helps to explain why the statute has been so difficult to implement. Sprint makes a statement (at 2) that the Commission's rule requiring "common carriers that provide billing and collection services to 800 information service providers comply with the billing information and format of pay-per-call services goes well beyond the mandate of TDDRA." While correct in perceiving that the burden of the rules outweighs the benefits, Sprint is incorrect in assuming that the billing and collection carriers, rather than the interexchange carriers, are responsible for compliance with the rules in the first instance. As the Commission's Report and Order made clear, the Commission has specifically

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identified the carriers subject to Section 64.1510. Those carriers are interexchange carriers. See Report and Order at ¶ 14, note 27.

To date, most of the interexchange carriers have not been involved in the implementation of the TDDRA. The billing and collection carriers who are exchange carriers have, by and large, been attempting to deal with the statute themselves independently, as secondarily affected entities. They have been acting for the most part in the absence of any significant undertaking by interexchange carriers other than AT&T to coordinate efficient compliance.

This reply is being filed late. USTA requests that it be considered by the Commission. USTA moved its offices during the period from December 2 through December 7 and access to LAN capability was affected. As these are reply comments, no one will be prejudiced.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

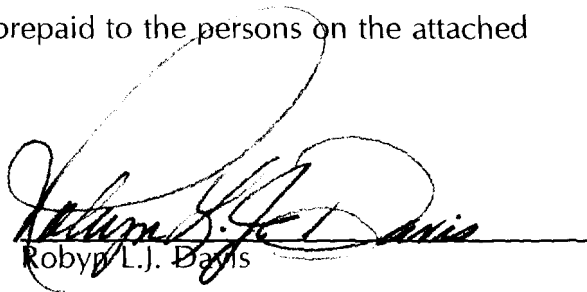
By: 

Martin T. McCue  
Vice President and General Counsel  
1401 H Street, N.W. - Suite 600  
Washington, D.C. 20005-2136  
(202) 326-7247

December 9, 1993

**CERTIFICATE OF SERVICE**

I, Robyn L.J. Davis, do certify that on December 9, 1993 copies of the Reply Comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.



Robyn L.J. Davis

Richard Blumenthal  
State of Connecticut  
Office of the Attorney General  
55 Elm Street, 7th Floor  
Hartford, CT 06106

John C. Thomas  
7911 Dartworth Drive  
Parma, OH 44129

William J. Free  
Richard C. Hartgrove  
Diana J. Harter  
Southwestern Bell Telephone Co.  
1010 Pine Street  
Room 2114  
St. Louis, MO 63101

B.J. Stonebraker  
Cincinnati Bell Telephone Co.  
201 E. Fourth Street  
102-300  
P.O. Box 2301  
Cincinnati, OH 45201

Philip F. McClelland  
Pennsylvania Office of  
Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120

The National Association of State  
Utility of Consumer Advocates  
1133 15th Street, NW  
suite 575  
Washington, DC 20005

Andrew D. Lipman  
Swidler & Berlin, Chartered  
3000 K Street, NW  
Suite 300  
Washington, DC 20007

John F. Sturm  
Claudia M. James  
Brigette M. Rouson  
Newspaper Association of  
America  
Dulles Airport - P.O. Box 17047  
Washington, DC 20004

Richard W. Wiley  
Michael Yourshaw  
Katherine A. King  
Wiley, Rein & Fielding  
1776 K Street, NW  
Washington, DC 20006

Edwin N. Lavergne  
Rodney L. Joyce  
Jay S. Newman  
Ginsburg, Feldman and Bress,  
Chartered  
1250 Connecticut Avenue, NW  
Washington, DC 20036

Sam Antar  
Kristin C. Gerlach  
Capital Cities/ABC, Inc.  
77 West 66th Street  
New York, NY 10023

Earl Nicholas Selby  
420 Florence Street  
Suite 200  
Palo Alto, CA 94301

Danny E. Adams  
Wiley, Rein & Fielding  
1776 K Street, NW  
Washington, DC 20006

Barbara Berger Opatowsky  
Better Business Bureau of  
Metropolitan New York, Inc.  
257 Park Avenue South  
New York, NY 10010

Christopher Herman  
610 North Carolina Avenue, SE  
Washington, DC 20003

National Association of Consumer  
Agency Administrators  
1010 Vermont Avenue, NW  
Suite 514  
Washington, DC 20005

Mary Sue Terry  
Gail Starling Marshall  
Office of the Attorney General  
Commonwealth of Virginia  
101 North 8th Street  
Richmond, VA 23219

Edward L. Petrini  
William H. Chambliss  
Office of the Attorney General  
Commonwealth of Virginia  
101 North 8th Street  
Richmond, VA 23219

Veronica M. Ahern  
Nixon, Hargrave, Devans & Doyle  
One Thomas Circle, NW  
Suite 800  
Washington, DC 20554

Jane A. Fisher  
Wiley, Rein & Fielding  
1776 K Street, NW  
Washington, DC 20006

Robin Pishel Ancona  
Marilyn Moore  
Michigan PSC  
6545 Mercantile Way  
P.O. Box 30221  
Lansing, MI 48909

Eileen E. Huggard  
City of New York  
Dept. of Telecommunications and  
Energy  
75 Park Place  
6th Floor  
New York, NY 10007

Jerry L. Webb  
Indiana Utility Regulatory Comm.  
913 State Office Building  
Indianapolis, IN 46204-2284

Ken McEldowney  
Consumer Action  
116 New Montgomery  
Suite 233  
San Francisco, CA 94105

Gregory M. Casey  
Telesphere-Wiltel  
655 W. Grand Avenue  
Suite 300  
Elmhurst, IL 60126

Brad E. Mutschelknaus  
Rachel J. Rothstein  
Wiley, Rein & Fielding  
1776 K Street, NW  
Washington, DC 20006

Howard J. Braun  
Rosenman & Colin  
1300 19th Street, NW  
Washington, DC 20036

Steven J. Metalitz  
Angela Burnett  
Information Industry Association  
555 New Jersey Avenue, NW  
Suite 800  
Washington, DC 20001

Josephine S. Trubek  
Rochester Telephone Corp.  
Rochester Tel. Center  
180 South Clinton Avenue  
Rochester, NY 14646-0700

Amy S. Gross  
NYCOM Information Services, Inc.  
2701 Summer Street #200  
Stamford, CT 06905

Ronald B. Mallard  
Fairfax County Consumer Affairs  
12000 Government Center Parkway  
Fairfax, VA 22035

Frank S. Levin  
Hall, Dickler, Lawler, Kent &  
Friedman  
460 Park Avenue  
New York, NY 10022-1906

Celia Nogales  
Pacific Telesis  
1275 Pennsylvania Avenue, NW  
Fourth Floor  
Washington, DC 20004

Floyd S. Keene  
Michael S. Pabian  
Ameritech Operating Cos.  
30 South Wacker Drive  
Suite 3900  
Chicago, IL 60606

William B. Barfield  
Richard M. Sbaratta  
Helen A. Shockey  
BellSouth Corporation  
4300 Southern Bell Center  
675 West Peachtree Street, NE  
Atlanta, GA 30375

Patrick A. Lee  
William J. Balcerski  
NYNEX  
120 Bloomingdale Road  
White Plains, NY

Chris Sutherland  
Promotion Marketing Association  
of America, Inc.  
322 Eighth Avenue  
New York, NY 10001

John M. Goodman  
Charles H. Kennedy  
Bell Atlantic Telephone Cos.  
1710 H Street, NW  
Washington, DC 20006

Francine J. Berry  
R. Steven Davis  
Peter H. Jacoby  
AT&T  
295 North Maple Avenue  
Room 3244J2  
Basking Ridge, NJ 07920

Randy Bakewell  
Missouri Office of the Public  
Counsel  
P.O. Box 7800  
Jefferson City, MO 65102

Linda F. Goldner  
National Consumers League  
815 15th Street, NW  
Suite 928N  
Washington, DC 20005

Mary J. Sisak  
Donald J. Elardo  
MCI Telecommunications Corp.  
1133 19th Street, NW  
Washington, DC 20036

Ward W. Wueste, Jr., HQE03J43  
Richard McKenna, HQE03J36  
GTE Service Corporation  
P.O. Box 152092  
Irving, TX 75015-2092

Gail L. Polivy  
GTE  
1850 M Street, NW  
Suite 1200  
Washington, DC 20036

Leon M. Kestenbaum  
Lesla Lehtonen  
United Telecommunications, Inc.  
1850 M Street, NW  
11th Floor  
Washington, DC 20036

Michael B. Fingerhut  
Marybeth M. Banks  
Sprint Corporation  
1850 M Street, NW  
11th Floor  
Washington, DC 20036

Craig T. Smith  
Sprint Corporation  
P.O. Box 11315  
Kansas City, MO 64112

Genevieve Morelli  
Competitive Telecommunications  
Association  
1140 Connecticut Avenue, NW  
Suite 220  
Washington, DC 20036

Robert J. Aamoth  
Reed, Smith, Shaw & McClay  
1200 18th Street, NW  
Washington, DC 20036

David Cosson  
L. Marie Guillory  
National Telephone Cooperative  
Association  
2626 Pennsylvania Avenue, NW  
Washington, DC 20037

The Honorable Bart Gordon  
103 Cannon Building  
Washington, DC 20515

Diane Dean  
State of NY DPS  
Three Empire State Plaza  
Albany, NY 12223

John Richeson  
Tel Control, Inc.  
P.O. Box 4087  
Huntsville, AL 35815-4087

Carol F. Sulkes  
Central Telephone Co.  
O'Hare Plaza  
8745 Higgins Road  
Chicago, IL 60631

Hubert H. Humphrey, III  
Gary R. Cunningham  
State of Minnesota  
340 Bremer Tower  
Seventh Place & Minnesota St.  
St. Paul, MN 55101

Linda C. Smith  
Veronica A. Smith  
John F. Povilaitis  
Pennsylvania PUC  
P.O. Box 3265  
Harrisburg, PA 17120

Joel R. Dichte  
Seham, Klein & Zelman  
Associated of Information  
Providers of New York  
485 Madison Avenue  
New York, NY 10022

George C. Davis  
United States Postal Service  
475 L'Enfant Plaza, SW  
Washington, DC 20260-1100

Robert J. Del Tufo  
State of New Jersey  
Department of Law and Public  
Safety  
Hughes Justice Complex  
GN 080  
Trenton, NJ 08625-0080

Paul Rodgers  
Charles D. Gray  
James Bradford Ramsay  
NARUC  
1102 ICC Building  
P.O. Box 684  
Washington, DC 20044

Eugene G. Hanes  
Alabama PSC  
P.O. Box 991  
Montgomery, AL 36101-0991

Mary Newmeyer  
Alabama PSC  
P.O. Box 991  
Montgomery, AL

P. Michael Cole  
Patton, Latham, Legge & Cole  
315 Market Street  
P.O. Box 470  
Athens, AL 35611-0470

Andrew D. Lipman  
Ann P. Morton  
Swidler & Berlin  
3000 K Street, NW  
Suite 300  
Washington, DC 20007

Bar Biszik  
Richard Mehr  
Music Access, Inc.  
90 Fifth Avenue  
Brooklyn, NY 11217

Ian D. Volner  
J. Brian DeBoice  
Cohn and Marks  
1333 New Hampshire Avenue, NW  
Suite 600  
Washington, DC 20036

Downtown Copy Center  
1114 21st Street, NW  
Washington, DC 20036

Rochelle D. Jones  
Southern New England Telephone  
227 Church Street  
New Haven, CT 06510

Robert J. Butler  
Wiley, Rein & Fielding  
1776 K Street, NW  
Washington, DC 20006

Joel B. Dichter  
Jane B. Jacobs  
Seham, Klein and Zelman  
485 Madison Avenue  
New York, NY 10022

Walter Steimel, Jr.  
Fish & Richardson  
601 13th Street, NW  
Fifth Floor North  
Washington, DC 20005

Glenn B. Manishin  
Blumenfeld & Cohen  
1615 M Street, NW  
Suite 700  
Washington, DC 20036

National Association of Consumer  
Agency Administrators  
1010 Vermont Avenue, NW  
Suite 514  
Washington, DC 20005

William J. Cowan  
NYDPS  
Three Empire State Plaza  
Albany, NY 12223

Albert H. Kramer  
Robert F. Aldrich  
Douglas E. Rosenfeld  
Keck, Mahin & Cate  
1201 New York Avenue, NW  
Penthouse Suite  
Washington, DC 20005

John W. Hunter  
McNair & Sanford, P.A.  
1155 15th Street, NW  
Washington, DC 20005

Peter Arth, Jr.  
Edward W. O'Neill  
Timothy E. Treacy  
People of the State of California and  
the Public Utilities Commission of  
the State of California  
505 Van Ness Avenue  
San Francisco, CA 94102

Lee A. Marc  
Summit Telecommunications Corp.  
1640 South Sepulveda Blvd.  
Suite 207  
Los Angeles, CA 90025

William W. Burrington  
The National Association for  
Information Services  
1250 Connecticut Avenue, NW  
Suite 600  
Washington, DC 20036